

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :
Plaintiffs, :
v. : C.A. No. 05-823-***
STANLEY TAYLOR, et al., :
Defendants. :
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PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT JOSEPH ADKINS

Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

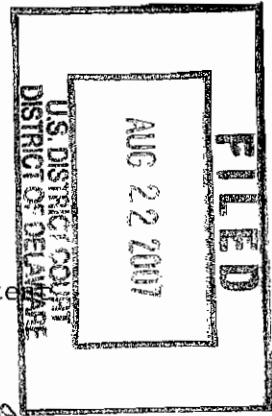
GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of
Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response
to Plaintiffs' Interrogatories", and any previous statements you given
to defendants' counsel or any one else in connection with this case before
coming here today?

4. Have you had a chance to meet and discuss the case with defendants'
counsel?
5. Do you realize that you are under oath, just as if you were at
trial testifying?
6. Is there any reason you can't give your best testimony today?



7. State your job title, and explain your general duties.

8. On July 20, 2005, an inmate reportedly found a parasite (larva) in his Beef Cube Steak, in which you carried out the investigation which included an inspection of the kitchen area. After your findings, was any replacement vermin control equipment such as bug lights ordered for the kitchen area?

9. Did "Going Clean" Pressure Washing Company steam clean the ~~the exhaust~~ hood system at the kitchen ~~before~~ before the filing of George A. Jackson's July 19, 2005 grievance, or after the filing of this December 1, 2005, Civil Action Complaint?

10. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a persons body works at a much higher stress level due to the lack of oxygen in the air?

11. Since you have worked at the SCI main kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate, or is he refer to the medical unit to be examined by the proper authorized personnel?

12. When inmate kitchen workers was housed in the air condition cool Merit building, if they refused to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a less desireable building.

13. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

14. Are you aware there is only one (1) toilet seat for 22 to 25 inmate workers to use, which forces workers to wait long periods, or even relieving themselves in the floor drains located in the ~~tray room~~ area?

15. Have you ever recorded the air temperature on the "old" side kitchen area?